

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

JESSICA JONES, *et al.*,

Plaintiffs,

v.

VARSITY BRANDS, LLC, *et al.*,

Defendants.

Case No. 2:20-cv-02892-tmp

**DECLARATION OF STEVEN J. KAISER IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFFS' CROSS-MOTION FOR SANCTIONS
AGAINST DEFENDANTS AND THEIR COUNSEL (ECF NO. 416)**

I, Steven J. Kaiser, declare as follows:

1. I am counsel to Varsity Brands, LLC; Varsity Spirit, LLC; Varsity Spirit Fashions & Supplies, LLC; Charlesbank Capital Partners, LLC; and Bain Capital Private Equity LP in this matter.

2. Attached as Exhibit A is a true and correct copy of Defendant U.S. All Star Federation, Inc.'s First Supplemental Responses to Plaintiffs' First Set of Interrogatories, dated October 3, 2022.

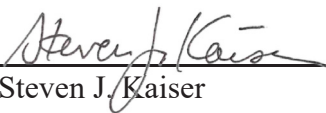
3. Attached as Exhibit B is a true and correct copy of the Responses of Defendants Bain Capital Private Equity and Charlesbank Capital Partners to Plaintiffs' First Set of Interrogatories, dated October 3, 2022.

4. Attached as Exhibit C is a true and correct copy of Defendant Jeff Webb's Supplemental

Objections and Answers to Plaintiffs' First Set of Interrogatories, dated October 3, 2022.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 6, 2023.



Steven J. Kaiser